



Chairperson: Bob Wyatt, NW Natural  
Treasurer: Fredrick Wolf, Legacy Site Services for Arkema

December 8, 2011

Lori Cora  
US EPA  
1200 Sixth Avenue  
ORC-158  
Seattle, Washington 98101

Chip Humphrey  
US EPA  
811 SW 6<sup>th</sup> Avenue  
Portland, Oregon 97204

RE: Portland Harbor Superfund Site RI/FS Trust Fund  
Revised Trust Budget Estimate  
Lower Willamette Group

Dear Ms. Cora and Mr. Humphrey;

The Portland Harbor Superfund Site Remedial Investigation and Feasibility Study Trust Fund meets the requirements of Section 26 of the Settlement and Administrative Order on Consent for the Portland Harbor Superfund Site and this letter summarizes our funding of the Trust Fund for the 2012 calendar year.

The Lower Willamette Group is currently preparing the Draft Feasibility Study with an anticipated submittal date of March 31, 2012 to the US Environmental Protection Agency. In addition, the Lower Willamette Group is awaiting comments to the revised RI/RA documents and will complete further revisions to those documents when comments are available.

In January 2011, the balance of the Trust was \$627,211.48. On July 15, 2011 a deposit of \$472,788.52 was made by the Lower Willamette Group into the Trust Fund to bring the total amount of the Trust up to the requested funding level of \$1,100,000. As the year has progressed, the funds in the Trust have been depleted as the revised RI/RA documents were prepared and work on the Draft Feasibility Study has progressed. The current amount in the Trust is \$266,351.16, however two certificates are pending with funding to be made prior to January 1, 2012. As of January 1, 2012, the balance in the Trust will be \$6,440.07.

The EPA has recommended that the amount of money in the Trust be increased in 2012 to include \$450,000 for the continued preparation of the Draft FS and \$200,000 for the further revisions to the Remedial Investigation, Human Health Risk Assessment, and Baseline Ecological Risk Assessment reports. Therefore, the Lower Willamette Group agrees to bring the total amount in the Trust to \$650,000 and make a deposit of \$643,559.93 into the Trust account.

The current cash position of the Lower Willamette Group is such that all currently available funds are needed for the operation of the project and additional cash will need to be raised to accomplish the funding of the Trust. Therefore, the Lower Willamette Group believes they can

raise the appropriate funding during January 2012 and will be able to fund the Trust by January 30, 2012.

The Lower Willamette Group will begin issuing certificates again in February 2012 for the withdrawal of funds from the Trust to assist with paying for the operation of the project. The Lower Willamette Group expects to withdraw a total of approximately \$450,000 from the Trust between February and May 2012 to fund the preparation of the Draft Feasibility Study. At that point, approximately \$200,000 will remain in the trust until the further revisions to the Remedial Investigation, Human Health Risk Assessment, and Baseline Ecological Risk Assessment reports are complete.

In December 2012, the Lower Willamette Group will again re-assess the status of the Trust with the EPA.

The Lower Willamette Group has again designated the Pearl District Office of the Bank of the West in Portland, Oregon to act as trustee for this trust.

If there are any questions regarding the Trust Fund, please contact David Ashton at the Port of Portland at 503-944-7090 or Hans Feige at 503-543-9700.

Sincerely;



Robert Wyatt  
Northwest Natural Gas

Cc: Kim Cox; City of Portland  
Fred Wolf; Legacy Site Services  
Kelly Madalinski; Port of Portland  
Hans Feige; Feige & Associates, Inc.  
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